

IN THE United States District Court
For THE Eastern District of Pennsylvania.

United States of America
Plaintiff,

v
Daniels Kenneth
Defendant.

CASE NO 15-127-1

AMENDMENT to Emergency Motion for
Reconsideration for Compassionate Release or
Sentence Reduce under 18 U.S.C 3582(C)(1)(A)(i)

"Expedited Ruling Request Due to COVID-19
Pandemic"

Defendant Kenneth Daniels, Respectfully ask the
Court to Amend His Compassionate Release 3582(C)(1)(A)(i).
Base on the extraordinary and compelling reason.
presented by the COVID-19 pandemic. Mr. Daniels
is 44 years old and suffer from numerous chronic medical
conditions including: hypertension, obesity, sleep apnea,
diabetes, asthma, Mental illness. The confluence of
which place him at a higher risk of dying should he
contract the novel coronavirus.

(1)

2)

Since Mr Daniels has been in Allenwood-Low, For the last 10 months. Mr Daniels have been having problems getting his Hypertension, sleep apnea and asthma under control. Mr Daniels has been on numerous of medicine for his conditions. Nothing has work to control them yet. ON 12/10/2020 Mr Daniels was seen for His High blood pressure. And it was very high so his medicine was swich again for 5th time. (see new medicine information) Mr Daniels was also told that the medicine that may help him. He can not recieve at Allenwood-Low Due to they are a care level 2 prison. And they are not able to give him a stronger medicine. He would have to be transfer to another prison that is a care level 3 prison that is able to give him the right medicine. However because of the pandemic that will not happening no time soon. Mr Daniels was schedule to get a much need surgery for carpal tunnel Syndrome. Due to the pandemic He will not be able to have it cause the prison is not allowing inmates to go out side for treatments. Mr Daniels has been in great pain and been trying to get this surgery over a year now. He has wrote BBS on medical just to get this matter taken care of. As well as trying to get a sleep machine. However He was suppose to go out for another sleep study over night. And that as well has been stop.

Mr Daniels suffers from Hypertension, Asthma which all are comorbidities associated with an increased risk of serious infection or death from COVID-19. Such as United States V. Cynthia E. Brown NO:13-176-05 May 22, 2020.

Mr Daniels also would like let the courts know that since He had filed for Reconsideration on 3582(C)(1)(A)(i) The cases of COVID-19 has rise over 150, something cases. within a matter of weeks. Now Not even a month Allen Wood-Low is Allowing Inmate to go to work again and work around different staff that come in and out the prison. Mr Daniels work in unicolor and every day a staff have to drive a truck from the other warehouse to where Mr Daniels work and load these trucks. these staff drive the truck come in contact with staff and inmates that work out side the prison. However if a staff come in contact with someone out there who have the disease. Mr Daniels can very well contract this disease. As of 12-26-2020 There was 134 inmate cases. and 9 staff. Yet on 12-28-2020 Mr Daniels have to report to work with other inmates and staff. He can not adequately protect Himself against this disease.

(3)

"Can not Adequately Protect Himself Against Infection in Prison"

Mr. Daniels vulnerability to COVID-19 prison is particularly dangerous place for him. COVID-19 is now inside Allenwood-LOW. Many of the recommended measure to prevent infection are impossible or unfeasible in prison. The Government's assurance that BOP's "Extraordinary Actions" can protect inmates ring hollow given that these measures have already failed to prevent transmission of the disease at Allenwood-LOW and the rest of there facilities. Where Mr. Daniels is housed. See Resp. Bro. 10. Indeed Congress and the Department of Justice are increasingly recognizing the danger of COVID-19 outbreaks in prison and encouraging steps to release some inmates.

Joseph J. Amon an infectious disease epidemiologist and Director of Global Health and Clinical Professor in the department of Community Health and Prevention at Drexel Dornsife School of Public Health, has studied infectious disease in Prison facilities States. Have even greater risk of infectious spread because of the conditions of crowding the proportion of vulnerable people and often scant medical care. People live in close quarters and are also subject to security measure which prohibit successful "social distancing"

That is needed to effectively prevent the spread of COVID-19. Toilets, sinks, and showers are shared without disinfection between use. Food preparation and food service is communal with little opportunity for surface disinfection. The crowded conditions, in both sleeping areas and social areas and all the share objects. (Bathrooms, sinks, Telphones, showers, etc.) will facilitate transmission.

B.O.P Website Proven insufficient to prevent the spread of COVID-19. Starting Dec 7, 2020 Allen Wood-LOW have had a great number of cases. between inmate and staff.

We are in midst of an unprecedented pandemic "COVID 19 has paralyzed the entire world. The disease has spread exponentially shutting down school, jobs, professional sports seasons, and life as we know it. It may kill 200,000 Americans and infect millions more. At this point there is no approved cure, treatment ~~to~~ prevent this. People with preexisting medical condition like Mr Daniels face a high Risk of dying or suffering severe health effects. Should he contract the disease.

Biden: Said: "ONE Thing I promise you about my leadership during this crisis. I'm going to tell it to you straight. Truth: "OUR Darkest Days in the battle against COVID-19 are Ahead of us, Not Behind us" pic: [Twitter.com/h9qthn](https://twitter.com/h9qthn) E2F49 Aaron Pupar @atrupar Dec 22, 2020.

Also, said: "Prepare themselves for the "Darkest Days" are still to come even with the vaccines being given.

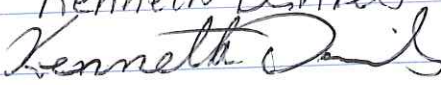
(5)

Mr Daniels ask for Despairity in His sentencing rule 3553(A)(4) I require equal treatment. IF Good for one, Good for all. A section 3582 motion requires equal treat for similarly situated inmates.

Mario Morales, an inmate that live in the same housing as Mr Daniels was granted Compassionate Release in case NO: 01CR802-1 by Judge Matthew F. Kennelly.

Jeremy Rodriguez was also granted Compassionate Release.

Cynthia E. Brown, NO: 13-176-05 was also granted Compassionate Release in her case.

Respectfully
Kenneth Daniels

#72055-066
Allenwood-LOW
P.O. Box 1000
White Deer Pa 17887.

11-28-2020

Read this medicine information sheet carefully each time you get this medicine filled. You must carefully read the "Consumer Information Use and Disclaimer" below in order to understand and correctly use this information.

This information is for MALE patients only. It does NOT include important information for FEMALE patients.

Metoprolol Tablets

Pronunciation (me toe PROE lole)

Brand Names: US Lopressor.

Warning

- Do not stop taking this drug all of a sudden. If you do, chest pain that is worse and in some cases heart attack may occur. The risk may be greater if you have certain types of heart disease. To avoid side effects, you will want to slowly stop this drug as ordered by your doctor. Call your doctor right away if you have new or worse chest pain or if other heart problems occur.

What is this drug used for?

- It is used to treat high blood pressure.
- It is used to treat chest pain or pressure.
- It is used after a heart attack to help prevent future heart attacks and lengthen life.
- It may be given to you for other reasons. Talk with the doctor.

What do I need to tell my doctor BEFORE I take this drug?

- If you are allergic to this drug; any part of this drug; or any other drugs, foods, or substances. Tell your doctor about the allergy and what signs you had.
- If you have any of these health problems: Certain types of abnormal heartbeats called heart block or sick-sinus syndrome, heart failure (weak heart), low blood pressure, poor blood flow to the arms or legs, shock caused by heart problems, or a slow heartbeat.
- If you have any of these health problems: Asthma or other breathing problems like COPD (chronic obstructive pulmonary disease).

This is not a list of all drugs or health problems that interact with this drug.

Tell your doctor and pharmacist about all of your drugs (prescription or OTC, natural products, vitamins) and health problems. You must check to make sure that it is safe for you to take this drug with all of your drugs and health problems. Do not start, stop, or change the dose of any drug without checking with your doctor.

What are some things I need to know or do while I take this drug?

- Tell all of your health care providers that you take this drug. This includes your doctors, nurses, pharmacists, and dentists.

- Avoid driving and doing other tasks or actions that call for you to be alert until you see how this drug affects you.
- To lower the chance of feeling dizzy or passing out, rise slowly if you have been sitting or lying down. Be careful going up and down stairs.
- Check blood pressure and heart rate as the doctor has told you.
- Have blood work checked as you have been told by the doctor. Talk with the doctor.
- This drug may affect certain lab tests. Tell all of your health care providers and lab workers that you take this drug.
- This drug may hide the signs of low blood sugar. Talk with the doctor.
- If you have high blood sugar (diabetes), you will need to watch your blood sugar closely.
- If you are taking this drug and have high blood pressure, talk with your doctor before using OTC products that may raise blood pressure. These include cough or cold drugs, diet pills, stimulants, non-steroidal anti-inflammatory drugs (NSAIDs) like ibuprofen or naproxen, and some natural products or aids.
- This drug may make it harder to tell if you have signs of an overactive thyroid like fast heartbeat. If you have an overactive thyroid and stop taking this drug all of a sudden, it may get worse and could be life-threatening. Talk with your doctor.
- If you have had a very bad allergic reaction, talk with your doctor. You may have a chance of an even worse reaction if you come into contact with what caused your allergy. If you use epinephrine to treat very bad allergic reactions, talk with your doctor. Epinephrine may not work as well while you are taking this drug.
- Talk with your doctor before you drink alcohol.

What are some side effects that I need to call my doctor about right away?

WARNING/CAUTION: Even though it may be rare, some people may have very bad and sometimes deadly side effects when taking a drug. Tell your doctor or get medical help right away if you have any of the following signs or symptoms that may be related to a very bad side effect:

- Signs of an allergic reaction, like rash; hives; itching; red, swollen, blistered, or peeling skin with or without fever; wheezing; tightness in the chest or throat;

THESE are the only time they are
Clean a Day!!

**BATHROOM
CLOSED FOR
CLEANING
0730-0830**

"This is the ONLY time They are
Clean a Day"

Showers

closed

11:30 – 1:30

INMATE NAME/NUMBER: Kenneth Daniels 2055-06 HARRISBURG PA 17
FEDERAL CORRECTIONAL COMPLEX-ALLENWOOD 6017
P.O. BOX 1000
WHITE DEER, PA 17887

28 DEC 2020 PM 3



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19106-17887

